

*Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

*N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.*

*In order to avoid confusion, please spell out the name of the month in each date.*

*Please fill out an original and one copy of this form (use additional space if required).*

1. Sender	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110				
2. Central Authority of the Requested State	The Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem				
3. Person to whom the executed request is to be returned	Lawrence Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110				
4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request	<table border="0"> <tr> <td>Date</td> <td>October 1, 2008</td> </tr> <tr> <td>Reason for urgency*</td> <td></td> </tr> </table>	Date	October 1, 2008	Reason for urgency*	
Date	October 1, 2008				
Reason for urgency*					

\* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3, a))

United States District Court for the District of Massachusetts  
One Courthouse Way  
Boston, MA 02110

b To the competent authority of (Article 3, a))

Israeli Central Authority  
Directorate of Courts  
19 Jaffa Road  
Jerusalem

c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel  
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State\*) (Article 3, b))

a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.  
Duane Morris, LLP  
470 Atlantic Avenue, Suite 500  
Boston MA 02110

b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.  
Burns & Levinson, LLP  
125 Summer Street  
Boston, MA 02110

c Other parties

Representatives

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
b	Summary of complaint	Parties' employment agreement for investment options.
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Lees Arieh 5 Keren Hayesod Street Ramat Hasharon
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Lees Arieh will be examined regarding Hananel's initiation of the Macau project and other matters.

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\* Omit if not applicable.

11. Documents or other property to be inspected (Article 3, g)\*

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used (Article 3, h)\*

All deposition testimony is to be given under oath.

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.) (Articles 3, i) and 9)\*

Defendant's counsel is to conduct the depositions.

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)\*

15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)\*

16. Specification of privilege  
or duty to refuse to give  
evidence under the law of  
the State of origin  
(Article 11, b))\*

17. The fees and costs incurred  
which are reimbursable under  
the second paragraph of  
Article 14 or under  
Article 26 of the Convention  
will be borne by\*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE  
REQUESTING AUTHORITY

